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Attorneys for Defendant  
The Goldman Sachs Group, Inc.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JACK J. GRYNBERG, PRICASPIAN  
DEVELOPMENT CORPORATION, a Texas  
corporation, RSM PRODUCTION  
CORPORATION, a Texas corporation, and  
GADECO LLC, a Colorado limited liability  
company,

Plaintiffs,

vs.

GOLDMAN SACHS GROUP, INC., a  
Delaware corporation, GOLDMAN SACHS  
INTERNATIONAL, a wholly-owned  
subsidiary, ABC COMPANIES 1-10 and JOHN  
DOES 1-40,

Defendants.

Civil Action No. 2:12-cv-03525-CCC-JAD

**NOTICE OF MOTION OF DEFENDANT  
THE GOLDMAN SACHS GROUP, INC.  
TO DISMISS THE COMPLAINT OR, IN  
THE ALTERNATIVE, TO TRANSFER  
THE ACTION**

TO: Raymond Marelic, Esq.  
Law Offices of Jae Y. Kim, L.L.C.  
One University Plaza, Suite 212  
Hackensack, New Jersey 07601-6206  
Attorneys for Plaintiffs

**PLEASE TAKE NOTICE** that Defendant The Goldman Sachs Group, Inc. ("Defendant"), by its undersigned counsel, will move this Court before the Honorable Judge Claire C. Cecchi, U.S.D.J., in Courtroom 2B of the United States Courthouse, United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey 07101, on a date and time to be determined by the Court or as soon thereafter as counsel can be heard for an Order (1) Dismissing the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(3)

and 28 U.S.C. § 1406 for improper venue, or transferring the Complaint to the United States Court for the Southern District of New York pursuant to 28 U.S.C. §§ 1406 or 1404(a); or (2) in the alternative, dismissing the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted, and for all such other and further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that Defendant will rely upon the Memorandum of Law, the Declarations of Matthew E. Tropp, Esq. and Niraj J. Parekh, Esq. (with attached exhibits) and all prior papers, pleadings and proceedings in this action in support of this motion.

Respectfully submitted,

**WOLFF SAMSON PC**

/s/Daniel D. Barnes

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Dated: August 21, 2012

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